

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

RENEE BARNAUSKAS,

Plaintiff,

v.

**SYNCHRONY BANK, and
GENPACT SERVICES, LLC,**

Defendants.

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Case No.

**DEFENDANT GENPACT SERVICES, LLC'S
NOTICE OF REMOVAL**

**TO: THE HONORABLE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

PLEASE TAKE NOTICE THAT on this date, Defendant Genpact Services, LLC ("Genpact"), hereby removes the above-captioned matter to this Honorable Court from the Court of Common Pleas of Lackawanna County, and in support thereof would respectfully show as follows:

1. Genpact is a defendant in a civil action originally filed on or about October 27, 2017, in the Court of Common Pleas of Lackawanna County, titled *Renee Barnauskas v. Synchrony Bank and Genpact Services, LLC*, and docketed to Case No. 17-CV-5702.

2. Genpact first received a copy of Plaintiff's Complaint by service on or about October 31, 2017. Also, Defendant Synchrony Bank first received a copy of Plaintiff's Complaint by service on or about October 30, 2017. Therefore, this removal is timely under 28 U.S.C. § 1446(b).

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3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit B are true and correct copies of all process, pleadings and orders received by Genpact in the state court action.

4. Removal is based upon federal question jurisdiction. Plaintiff has alleged claims against Genpact under the the Telephone Consumer Protection Act, 47 U.S.C. § 227, and the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, two federal statutes. Therefore, the United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, and this action is removable to this Court pursuant to 28 U.S.C. § 1441. Accordingly, Genpact hereby removes this action to the United States District Court for the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1446.

5. Defendant Synchrony Bank, by and through its attorney, Jonathan M. Marmo of ReedSmith LLP, consents to the removal of this case. See the “*Consent to Removal by Defendant Synchrony Bank*,” that is attached hereto as Exhibit B.

6. Promptly after the filing of this Notice, Genpact will provide notice of this removal to all parties and to the Court of Common Pleas of Lackawanna County, Pennsylvania.

WHEREFORE, PREMISES CONSIDERED, Defendant Genpact Services, LLC removes this case to the United States District Court for the Middle District of Pennsylvania.

Dated: November 27, 2017

Respectfully submitted,

BARRON & NEWBURGER, P.C.

/s/ Brit J. Suttell
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Counsel for Defendant Genpact Services, LLC

CERTIFICATE OF SERVICE

I certify that on November 27, 2017, a true copy of the foregoing document was served on Plaintiff's Counsel below via the Court's ECF system and/or via e-mail:

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Counsel for Defendant
Synchrony Bank

I further certify that on November 27, 2017, a true copy of the foregoing document was served on the persons below via U.S. Mail, postage pre-paid:

Prothonotary – Civil Division
Lackawanna County
Court of Common Pleas
Brooks Building
436 Spruce Street
Scranton, PA 18503

/s/ Brit J. Suttell
BRIT J. SUTTELL, ESQ.